Steve Parker
Par-Kan Company
P.O.Box 219
Silver Lake, IN 46982

Re: 085-11545
First Minor Permit Modification to
Part 70 No.: T 085-6631-00012

Dear Steve Parker:

Par-Kan Company was issued a permit on December 30, 1997 for operation of fabrication of metal refuse products. A letter requesting changes to this permit was received on November 15, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of addition of 1.3 MBTU/hour Natural gas based Air Makeup unit as an insignificant activity.

All other conditions of the permit shall remain unchanged and in effect. No changes are made to the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Gurinder Saini or extension (3-0203), or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

GS
cc: File - Kosciusko County
U.S. EPA, Region V
Kosciusko County Health Department
Northern Regional Office
Air Compliance Section Inspector – Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Minor Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Par-Kan Company**
Source Location:	**State Road 15 North, Silver Lake IN 46982**
County:	**Kosciusko**
SIC Code:	**3491**
Operation Permit No.:	**T 085-6631-00012**
Operation Permit Issuance Date:	**December 30, 1997**
Minor Permit Modification No.:	**T 085-11545-00012**
Permit Reviewer:	**Gurinder Saini**

The Office of Air Management (OAM) has reviewed a modification application from Par-Kan Company relating to the operation of fabrication of metal refuse products.

History

On November 15, 1999, Par-Kan Company submitted an application to the OAM requesting to add an air make-up unit to their existing plant. Par-Kan Company was issued a Part 70 permit on December 30, 1997. This modification is as follows:

One (1) Natural gas based Air Make up unit of 1.3 MBTU/hour capacity to be added as an insignificant activity.

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Minor Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12 (c) (1). This rule handles group processing of exempt units.

The Part 70 Operating Permit already contains the following insignificant activity category under A.3 (1). This make-up unit will be added to this category. Thus no permit language change is necessary due to this modification

Existing Approvals

The source was issued a Part 70 Operating Permit T085-6631-00012 on December 30, 1997.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 15, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as Athe maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.@

Pollutant	Potential To Emit (tons/year)
PM	-
PM-10	-
SO_2	-
VOC	-
CO	-
NO_x	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

As the Potential to Emit of any Criteria Pollutant is insignificant, hence this activity will be considered as insignificant activity in the Part 70 Permit.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been

designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Kosciusko County and the potential to emit criteria pollutant is less than ten (10) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source=s failure to take the appropriate corrective actions within a specific time period.

Conclusion

The operation of this fabrication of metal refuse products shall be subject to the conditions of the attached proposed *Part 70* Permit No. *T*085-11545-00012.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Air Makeup unit

Company Name: **Par-Kan Company**
Address City IN Zip: **State Road 15 North, Silver Lake IN 46982**
CP: **085-11545**
Plt ID: **085-00012**
Reviewer: **Gurinder Saini**
Date: 23-May-00

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
0.0	0.0

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	0.0	0.0

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

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See page 2 for HAPs emissions calculations.

updated 4/99

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name:
Address City IN Zip:
CP:
Plt ID:
Reviewer:
Date:

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.196E-08	6.833E-09	4.271E-07	1.025E-05	1.936E-08

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.847E-09	6.263E-09	7.972E-09	2.164E-09	1.196E-08

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.